

U.S. DISTRICT COURT  
EASTERN DISTRICT-WI  
FILED  
UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF WISCONSIN  
2021 MAY 25 P 1:45

UNITED STATES OF AMERICA,

CLERK OF COURT

Plaintiff,

Case No.

**21-CR-110**

v.

18 U.S.C. §§ 1591(a)(1), (b)(1)(c),  
2422(b), & 2423(b)]

PAUL S. OSTERMAN,

Green Bay Division

Defendant.

**INDICTMENT**

**COUNT ONE**

**(Sex Trafficking of a Child Under 14)**

**THE GRAND JURY CHARGES THAT:**

Between approximately July 3, 2019, and July 5, 2019, in the State and Eastern District of Wisconsin, the State and Northern District of Illinois, and elsewhere,

**PAUL S. OSTERMAN,**

in and affecting interstate and foreign commerce, did knowingly recruit, entice, harbor, obtain, maintain, solicit, and patronize JV-1, having had a reasonable opportunity to observe JV-1, and knowing and in reckless disregard of the fact that JV-1 had not attained the age of 18 years and would be caused to engage in a commercial sex act.

In violation of Title 18, United States Code, Sections 1591(a)(1), (b)(1), and (c).

**COUNT TWO**  
**(Enticement of a Minor)**

**THE GRAND JURY FURTHER CHARGES THAT:**

Between approximately July 3, 2019, and July 5, 2019, in the State and Eastern District of Wisconsin, the State and Northern District of Illinois, and elsewhere,

**PAUL S. OSTERMAN,**

using a facility and means of interstate commerce, did knowingly persuade, induce, and entice an individual, JV-1, who had not attained the age of 18 years, to engage in sexual activity for which any person could be charged with a criminal offense.

In violation of Title 18, United States Code, Section 2422(b).

**COUNT THREE**  
**(Travel with Intent to Engage in Illicit Sexual Activity)**

**THE GRAND JURY FURTHER CHARGES THAT:**

Between approximately July 3, 2019, and July 5, 2019, in the State and Eastern District of Wisconsin, the State and Northern District of Illinois, and elsewhere,

**PAUL S. OSTERMAN**

did travel in interstate commerce for the purpose of engaging in any illicit sexual contact with another person, that is a commercial sex act with a person under the age of 18, in violation of Title 18, United States Code, Section 1591(a)(1).

In violation of Title 18, United States Code, Section 2423(b).

### **FORFEITURE NOTICE**


1. Upon conviction of the offense of sex trafficking of a child, in violation of 18 U.S.C. §§ 1591(a)(1), (b)(1) and (c) as set forth in Count One of this Indictment, the defendant shall forfeit to the United States of America, pursuant to Title 18, United States Code, Sections 1594(d)(1) and (d)(2) any property constituting, or derived from, proceeds obtained, directly or indirectly, as a result of the violation and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of the offense. The property to be forfeited includes, but is not limited to, a sum of money equal to the proceeds derived from the offense.

2. Upon conviction of the offenses of enticement of a minor and travel with intent to engage in sexual activity, in violation of 18 U.S.C. §§ 2422(b) and 2423(b), as set forth in Counts Two and Three of this Indictment, the defendant shall forfeit to the United States of America, pursuant to Title 18, United States Code, Sections 981(a)(1)(C) and 2428(a)(1), and Title 28, United States Code, Section 2461(c), any property constituting, or derived from, proceeds obtained, directly or indirectly, as a result of the violations and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of the offenses. The property to be forfeited includes, but is not limited to, a sum of money equal to the proceeds derived from the offenses.

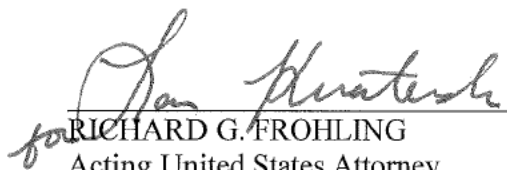
3. If any of the property described above, as a result of any act or omission by a defendant: cannot be located upon the exercise of due diligence; has been transferred or sold to, or deposited with, a third person; has been placed beyond the jurisdiction of the Court; has been substantially diminished in value; or has been commingled with other property which cannot be subdivided without difficulty, the United States of America shall be entitled to forfeiture of

substitute property, pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c).

A TRUE BILL:

  
FOREPERSON

Dated: May 15, 2021

  
RICHARD G. FROHLING  
Acting United States Attorney